

HONORABLE BENJAMIN H. SETTLE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

HP TUNERS, LLC, a Nevada limited liability
company,

Plaintiff,

vs.

KEVIN SYKES-BONNETT and SYKED)
ECU TUNING INCORPORATED, a)
Washington corporation, and JOHN)
MARTINSON,

Defendants.

CASE NO. 3:17-cv-05760-BHS

**PLAINTIFF'S VOIR DIRE
SUGGESTIONS FOR THE COURT**

Plaintiff HP TUNERS, LLC, a Nevada limited liability company ("HPT"), hereby
submits its Voir Dire Suggestions for the Court as follows:

1. Does anyone here work for a company that is being sued or has been sued over a
business dispute? If so, please explain.
2. Has anyone here personally been a Plaintiff or a Defendant in a civil lawsuit? If
so, please explain.
3. Does anyone here think there are too many lawsuits today? If so, please explain.

1 4. Does anyone here think that most lawsuits are frivolous, or without merit? If so,
2 please explain.

3 5. Has anyone on the jury panel ever worked for a technology company? If so,
4 please explain.

5 6. Has anyone here ever worked for social media company? If so, please explain.

6 7. Would anyone here consider themselves to be more active on social media than
7 the average person? If so, please explain.

8 8. Does anyone here have any training or work experience with computer
9 programming or with source code? If so, please explain.

10 9. Does anyone here have any training or work experience with accounting or book-
11 keeping? If so, please explain.

12 10. Has anyone here ever been responsible for doing research and development
13 (R&D) at work? If so, please explain.

14 11. Does anyone here feel like companies should not be able to file lawsuits against
15 individual people for money damages? If so, please explain.

16 12. Does anyone here think it is unfair for an employer to ask an employee to promise
17 not to solicit customers of that employer for a certain period of time after the employment has
18 ended? If so, please explain.

19 13. Does anyone here have any experience leaving a job or place of employment and
20 going to work for a direct competitor? If so, please explain.

21 14. Has anyone here ever been in a dispute with a business partner or associate,
22 perhaps over money or something else? If so, please explain.

16. Has anyone here ever worked in sales or in a commission-based job? If so, was it a good experience or bad?

17. Has anyone here every worked for a company that has trade secrets? If so, how were those trade secrets protected?

18. Has anyone here ever worked for a company that had highly confidential information? If so, what step were in place to make sure that information did not get into the hands of a competitor?

19. Has or is anyone here a member of a labor union? If so, which one(s)?

20. Has or does anyone here work for a law firm? If so, which one (s)? What is (was) your job?

21. Does anyone here believe that all software and technology should be free for the public to use, as opposed allowing developers to place to restrictions on it? If so, please explain.

22. In a lawsuit involving a company against an individual, would anyone here start off favoring the individual? If so, please explain.

23. Based on what you have heard and your past life experiences, please raise your hand if you cannot be a fair and impartial juror due to the type of case this is or due to any of the facts you have heard. If so, please explain.

Dated this 8th day of October, 2019

Respectfully submitted,

s/ Andrew P. Bleiman
Attorneys for HP Tuners, LLC

1 Stephen G. Leatham, WSBA #15572
2 Heurlin, Potter, Jahn, Leatham & Holtmann, P.S.
3 PO Box 611
4 211 E. McLoughlin Boulevard
5 Vancouver, WA 98666-0611
6 Telephone: (360) 750-7547
7 Fax: (360) 750-7548
8 E-mail: sgl@hpl-law.com

9 Andrew P. Bleiman (admitted *pro hac vice*)
10 Marks & Klein
11 1363 Shermer Road, Suite 318
12 Northbrook, Illinois 60062
13 (312) 206-5162
14 andrew@marksklein.com
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATE OF SERVICE

I hereby certify that on October 8, 2019, I caused the foregoing to be electronically with the Clerk of Court using the **CM/ECF system** which will electronically send Notice to all Counsel of Record.

MARKS & KLEIN

s/ Andrew P. Bleiman
Andrew P. Bleiman (admitted *pro hac vice*)
1363 Shermer Road, Suite 318
Northbrook, Illinois 60062
Telephone: (312) 206-5162
E-mail: andrew@marksklein.com

Attorney for Plaintiff